UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

GORRELL DAIRY LLC, : CHAPTER 12

ROBIN J. GORRELL : (Jointly Administered)

Debtors

: Judge Robert N. Opel, II

OBJECTION OF CARGILL, INC. TO DEBTORS' JOINT CHAPTER 12 PLAN

The objections of Cargill, Inc., by its attorneys, Doran & Doran, P.C., to the Debtor's Chapter 12 Plan filed on May 20, 2019 are as follows:

- 1. The above Debtors filed a petition for relief under Chapter 12 of the Bankruptcy Code on December 17, 2018 and remain in possession at this time.
- By Order of the Bankruptcy Court dated April 18, 2019, the Chapter 12 case of Glenn
 Gorrell and Robin J. Gorrell was administratively consolidated with the Chapter 12 case of Gorrell Dairy LLC.
 - 3. On May 20, 2019 the jointly administered Debtors filed their Joint Chapter 12 Plan.
- 4. By Order of March 20th, 2019, the Bankruptcy Court allowed Cargill, Inc. a §503(b) administrative claim of \$37,007.12.
- 5. In paragraph 5(c) of the Joint Chapter 12 Plan, the Debtors propose to pay the administrative claim of Cargill, Inc., but the claim amount is listed as \$28,329.46
- 6. Cargill, Inc. is objecting to the Joint Chapter 12 Plan because the amount of the administrative claim to be paid in the Plan is inconsistent with the Order.

WHEREFORE, Creditor, Cargill, Inc., objects to the joint Chapter 12 Plan and requests that the amount of the administrative claim of Cargill, Inc. to be paid in §5(c) of the Plan be corrected to \$37,007.12.

Respectfully submitted:

DORAN & DORAN, P.C.

By: /s/Lisa M. Doran, Esquire
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Dated: 5-23-2019

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CERTIFICATE OF SERVICE

AND NOW, I hereby certify that on <u>5-23-2019</u>, I have served the within Objection to Chapter 12 Plan on the following parties automatically by electronic notice through ECF system:

William G. Schwab, Trustee ECF@uslawcenter.com

David H. Ealy, Esq. – Atty for Debtors dealy@trevettcristo.com

United States Trustee ustpregion03.ha.ecf@usdoj.gov

I certify under penalty of perjury that the foregoing is true and correct.

Dated: 5-23:-2019

/s/ Lisa M. Doran
Lisa M. Doran, Esquire